

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
-----X

UBALDO MISAICO,

07CV4495

Plaintiffs,

ANSWER TO
AMENDED
COMPLAINT

- against -

AJ GOLDSTEIN & CO., ALAN KASMAN DBA
KASCO, ALAN L. MERRIL, ANN TAYLOR
STORES CORPORATION, BANKERS TRUST
COMPANY, BATTERY PARK CITY
AUTHORITY, BETTY JEAN GRANQUIST,
BLACKMON-MOORING-STEAMATIC
CATASTROPHE, INC. D/B/A BMS CAT, BOARD
OF MANAGERS OF THE HUDSON VIEW EAST
CONDOMINIUM, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS,
LP, BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC.,
BT PRIVATE CLIENTS CORP., CAROL
GAYNOR TRUST, CAROL GAYNOR, AS
TRUSTEE OF THE CAROL GAYNOR TRUST,
CAROL MERRIL GAYNOR, CITY WIDE
ADMINISTRATIVE SERVICES,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIROTECH CLEAN AIR,
INC., FRED GOLDSTEIN, GPS
ENVIRONMENTAL CONSULTANTS, INC.,
HARLAND GAYNOR, AS TRUSTEE UNDER A
DECLARATION OF TRUST, HAROLD G.
GOLDSTEIN, AS TRUSTEE UNDER A
DECLARATION OF TRUST, HERMAN L.
BLUM, AS TRUSTEE UNDER THE LAST WILL
AND TESTAMENT OF LOUIS W. GOLDSTEIN,
HILLMAN ENVIRONMENTAL GROUP, LLC..

HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
IDELL GOLDSTEIN, AS TRUSTEE UNDER
DECLARATION OF TRUST, INDOOR
ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
LIBERTY VIEW ASSOCIATES, L.P.,
MANUFACTURERS HANOVER TRUST
COMPANY, MARGARET G. WATERS,
MARGUERITE K. LEWIS, AS TRUSTEE
UNDER THE LAST WILL AND TESTAMENT
OF LOUIS W. GOLDSTEIN, MATTHEW A.
GELBIN, AS TRUSTEE OF THE GELBIN
FAMILY, MERRILL LYNCH & CO, INC.,
NATALIE S. LEBOW, AS TRUSTEE OF THE
JEREMIAH PHILIP LEBOW REVOCABLE
TRUST, NATALIE S. LEBOW, AS TRUSTEE OF
THE JERRY P. LEBOW FAMILY TRUST,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL,
INC., PAMELA BETH KLEIN, AS TRUSTEE OF
THE PAMELA AND ROWAN KLEIN TRUST,
RY MANAGEMENT CO., INC., RELATED BPC
ASSOCIATES, INC., RELATED
MANAGEMENT CO., LP, ROWAN K. KLEIN,
AS TRUSTEE OF THE PAMELA AND ROWAN
KLEIN TRUST, RUTH G. LEBOW, RY
MANAGEMENT, SABINE ZERARKA,
SHIRLEY G. SHOCKLEY, AS TRUSTEE
UNDER DECLARATION OF TRUST,
STRUCTURE TONE (UK), INC., STRUCTURE
TONE GLOBAL SERVICES, INC., SYLVIA R.
GOLDSTEIN, THE BANK OF NEW YORK
TRUST COMPANY NA, THE RELATED
COMPANIES, LP, THE RELATED REALTY
GROUP, INC., TISHMAN INTERIORS
CORPORATION, TOSCORP INC., TUCKER
ANTHONY, INC., TULLY CONSTRUCTION
CO., INC., TULLY INDUSTRIES, INC,
VERIZON NEW YORK, INC, WESTON
SOLUTIONS, INC., WFP TOWER A CO., WFP
TOWER A CO. G.P. CORP., WFP TOWER A.
CO., L.P., WFP TOWER B CO. G.P. CORP., WFP
TOWER B HOLDING CO., LP, WFP TOWER B.
CO., L.P., WFP TOWER D CO. G.P. CORP., WFP
TOWER D HOLDING CO. I L.P., WFP TOWER

D HOLDING CO. II L.P., WFP TOWER D
HOLDING I G.P. CORP., AND WFP TOWER D.
CO., L.P., ET AL

Defendants.

-----X
PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
April 1, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
Attorneys for Defendant –Envirotech
3000 Marcus Avenue, Suite 2E1
Lake Success, New York 11042
(516) 775-5800

BY: 
Heather L. Smar (4622)